



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

EUSEBIO SANTOS-MORENO,
aka "Luis Sanchez,

Defendant.

Case No. 2:25-cr-00105-SPG

I N D I C T M E N T

[18 U.S.C. §§ 922(g)(1), (5)(A):
Prohibited Person in Possession of
Firearms and Ammunition; 8 U.S.C.
§§ 1326(a), (b)(1), (b)(2): Alien
Found in the United States
Following Deportation; 18 U.S.C.
§ 924(d)(1), 28 U.S.C. § 2461(c):
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 922(g)(1), (5)]

On or about July 19, 2024, in Los Angeles County, within the
Central District of California, defendant EUSEBIO SANTOS-MORENO, also
known as "Luis Sanchez," knowingly possessed the following firearms
and ammunition, each in and affecting interstate and foreign
commerce:

1. A Glock, model 19X, 9mm Luger caliber semi-automatic
pistol, bearing serial number BWZT043;

1 2. A Springfield Armory, model 1911-A1, .45 ACP caliber semi-
2 automatic pistol, bearing serial number NM182589;

3 3. A Mossberg, model 500, 20-gauge shotgun, bearing serial
4 number P048254;

5 4. A Remington, model 870, 12-gauge shotgun, bearing serial
6 number DUGG-3084;

7 5. A Palmetto State Armory, model PSAK47, 7.62x39mm caliber
8 semi-automatic rifle, bearing serial number AKB048406;

9 6. A Ceska Zbrojovka, model Scorpion EVO 3 S1, 9mm Luger
10 caliber semi-automatic carbine, bearing serial number C094146;

11 7. A Derya Arms, model Carina, 12-gauge shotgun, bearing
12 serial number R420867;

13 8. Fifty rounds of X-Treme 9mm Luger caliber ammunition; and

14 9. Twenty-five rounds of Hornady .22 Hornet caliber
15 ammunition.

16 Defendant SANTOS-MORENO possessed such firearms and ammunition
17 knowing that he had previously been convicted of at least one of the
18 following felony crimes, each punishable by a term of imprisonment
19 exceeding one year:

20 1. Possession of More Than Ten Grams of Ephedrine, in
21 violation of Michigan Compiled Laws Section 333.17766c(1), in the
22 State of Michigan Second Circuit Court, County of Berrien, Case
23 Number 2005410662-FH, on or about February 8, 2005; and

24 2. Importation of Pseudoephedrine, in violation of Title 21,
25 United States Code, Sections 952 and 960, in the United States
26 District Court for the Eastern District of Washington, Case Number
27 2:08-CR-00181-LRS-2, on or about September 1, 2009.

28 Additionally, defendant SANTOS-MORENO possessed such firearms

1 and ammunition knowing that he was then an alien illegally and
2 unlawfully in the United States.

COUNT TWO

[8 U.S.C. §§ 1326(a), (b)(1), (b)(2)]

On or about July 19, 2024, defendant EUSEBIO SANTOS-MORENO, also known as "Luis Sanchez," an alien, who had been officially deported and removed from the United States on or about December 19, 2013, was found in Los Angeles County, within the Central District of California, after knowingly and voluntarily re-entering and remaining in the United States without having obtained permission from the Attorney General or his designated successor, the Secretary of Homeland Security, to reapply for admission to the United States following deportation and removal.

Defendant SANTOS-MORENO's previously alleged deportation and removal from the United States occurred subsequent to defendant SANTOS-MORENO's conviction for a felony, namely, Possession of More Than Ten Grams of Ephedrine, in violation of Michigan Compiled Laws Section 333.17766c(1), in the State of Michigan Second Circuit Court, County of Berrien, Case Number 2005410662-FH, on or about February 8, 2005, for which defendant was sentenced to 90 days' imprisonment.

Defendant SANTOS-MORENO's previously alleged deportation and removal from the United States occurred subsequent to defendant SANTOS-MORENO's conviction for an aggravated felony, namely, Importation of Pseudoephedrine, in violation of Title 21, United States Code, Sections 952 and 960, in the United States District Court for the Eastern District of Washington, Case Number 2:08-CR-00181-LRS-2, on or about September 1, 2009, for which defendant SANTOS-MORENO was sentenced to 70 months' imprisonment.

FORFEITURE ALLEGATION

[18 U.S.C. § 924 and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of Count One in this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5
6 /s/_____
7 Foreperson

8 JOSEPH T. MCNALLY
9 Acting United States Attorney

10 LINDSEY GREER DOTSON
11 Assistant United States Attorney
12 Chief, Criminal Division

13 

14 FRANCES S. LEWIS
15 Assistant United States Attorney
16 Chief, General Crimes Section

17 SHAWN T. ANDREWS
18 Assistant United States Attorney
19 Deputy Chief, General Crimes
20 Section

21 BRANDON E. MARTINEZ-JONES
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24 Section
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